REMARKS

Claims 1-24 are pending in the present application.

Claims 1-24 are rejected.

Claims 1, 3-7, 9-13, 15-18, and 21 are amended as set forth herein.

Reconsideration of the claims is respectfully requested.

CLAIM REJECTION UNDER 35 U.S.C. § 103

Claims 1-6 and 13-24 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Publication No. 2003/0069955 to *Gieseke et al.*, hereinafter "Gieseke" in view of U.S. Patent No. 7,433,941 to *Lavian et al.*, hereinafter "Lavian", and in view of what the Office Action characterizes as Applicants' own Admitted Prior-Art, hereinafter "AAPA". Claims 7-12 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Gieseke in view of AAPA. The Applicants respectfully traverse the rejections.

In *ex parte* examination of patent applications, the Patent Office bears the burden of establishing a *prima facie* case of obviousness. MPEP § 2142, p. 2100-127 (8th ed. rev. 7 July 2008). Absent such a *prima facie* case, the applicant is under no obligation to produce evidence of nonobviousness. *Id.*

To establish a prima facie case of obviousness, three basic criteria must be met: First, there must be some reason – such as a suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art – to modify the reference or to

combine reference teachings. MPEP § 2142, pp. 2100-127 to 2100-128 (8th ed. rev. 7 July 2008);

MPEP § 2143, pp. 2100-128 to 2100-139; MPEP § 2143.01, pp. 2100-139 to 2100-141. Second,

there must be a reasonable expectation of success. MPEP § 2143.02, pp. 2100-141 to 2100-142 (8th

ed. rev. 7 July 2008). Finally, the prior art reference (or references when combined) must teach or

suggest all of the claim limitations. MPEP § 2143.02, pp. 2100-141 to 2100-142 (8th ed. rev. 7 July

2008).

Independent Claim 1 has been amended to recite that "the MIB data structure" generated in

the "first object-oriented telecommunication device" comprises "a method name identifying a

method associated with a target object in the second object-oriented telecommunication device."

This feature is adapted from features found in previously-presented Claim 4. This feature is not

taught or suggested by Gieseke, Lavian, or AAPA, separately or in combination.

In its rejection of Claim 4, the Office Action asserts that paragraph [0050] of Gieseke teaches

an MIB data structure that comprises a target method ID. For convenience, paragraph [0050] is

reproduced below:

> [0050] Additional exemplary operations of the SNMP agent (configuration server) 200, the generation of binary configuration files 226 and CLI command set generation 228, are also shown in FIG. 2. When a "show running config" command is received 230 for CLI command set generation, the master agent 202 passes the command to the COM 212 for processing and creation of a CLI configuration command set that reflects the current network element or chassis configuration 232. Each object instance 214, 216, or 218 managed by the COM 212 knows how to generate the commands that reflect its configuration. Command sets for all object instances 214, 216, or 218 are aggregated together to create the complete command set for the network element or chassis. As each object instance 214, 216, or 218 only has to generate its portion of the command set the "show running config" operation is highly efficient. The chassis configuration is in another embodiment generated in the

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form of XML using the command "show running-config xml".
(Gieseke, ¶ [0050]).

It is clear that paragraph [0050] of Gieseke does not disclose anything about a MIB data structure or a method ID or name. Paragraph [0050] certainly does not teach or suggest a MIB data structure generated in a first object-oriented telecommunication device that includes a method name identifying a method associated with a target object in the second object-oriented telecommunication device. While other sections of Gieseke separately disclose MIB data structures and object methods in general, no section of Gieseke teaches or suggests a MIB data structure generated in a first object-oriented telecommunication device that includes a method name identifying a method associated with a target object in the second object-oriented telecommunication device.

For at least these reasons, Claim 1 is patentable over Gieseke. Lavian and AAPA do not cure the deficiencies of Gieseke. Therefore, Claim 1 is patentable over Gieseke, Lavian, and AAPA, separately or in combination. Independent Claims 7 and 13 recite features analogous to those emphasized in traversing the rejection of Claim 1 and, therefore, are also patentable over the cited references. Claims 2-6, 8-12, and 14-24 depend from Claims 1, 7, and 13, respectively. As such, Claims 2-6, 8-12, and 14-24 are also patentable at a minimum due to their dependence from allowable base claims.

Accordingly, the Applicants respectfully request the Examiner to withdraw the § 103 rejection.

CONCLUSION

As a result of the foregoing, the Applicants assert that the remaining claims in the Application are in condition for allowance, and respectfully request that this Application be passed to issue.

If any issues arise, or if the Examiner has any suggestions for expediting allowance of this Application, the Applicants respectfully invite the Examiner to contact the undersigned at the telephone number indicated below or at *jmockler@munckcarter.com*.

The Commissioner is hereby authorized to charge any additional fees connected with this communication or credit any overpayment to Deposit Account No. 50-0208.

Respectfully submitted,

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